

HON. RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CRYSTAL HOWERY,

Plaintiff,

v.

INTERNATIONAL ASSOCIATION OF  
MACHINISTS AND AEROSPACE  
WORKERS,

Defendant.

No. 14-cv-01814 RAJ

**DECLARATION OF KRISTINA  
DETWILER IN SUPPORT OF MOTION  
FOR SUMMARY JUDGMENT**

I, Kristina Detwiler, declare and state as follows:

1. I am one of the attorneys for the International Association of Machinists and Aerospace Workers, District Lodge 751 ("Union").

2. In June 2013, the Plaintiff filed a Notice of Charge of Discrimination with the U.S. Equal Employment Opportunity Commission and the Washington State Human Rights Commission against the Union. Copies of these charges are attached to this declaration as Exhibit A.


3. Plaintiff received a right to sue letter from the EEOC on January 29, 2014. A copy of the right to sue letter is attached as Exhibit B. On the last day to timely file suit, April

1 29, 2014, Plaintiff filed an Employment Discrimination Complaint against the Union in U.S.  
2 District Court for the Northern District of California.

3 4. On June 19, 2015, I served Plaintiff with interrogatories and requests for  
4 production. One interrogatory asked Plaintiff whether she was pursuing a claim for violation of  
5 a Civil Rights Act other than her Title VII claims under the Civil Rights Act of 1964. Another  
6 interrogatory asked Plaintiff to identify any "other violations of the law" that she alleged the  
7 Union violated. Plaintiff did not provide answers to any of the Union's discovery requests,  
8 including these two interrogatories.  
9

10 I declare under penalty of perjury under the laws of the State of Washington that the  
11 foregoing is true and correct to the best of my knowledge and belief.

12 Signed in Seattle, Washington this 20<sup>th</sup> day of August, 2015.

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16 Kristina Detwiler  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 20<sup>th</sup>, 2015, I electronically filed the foregoing  
**DECLARATION OF KRISTINA DETWILER IN SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT** with the Clerk of the Court using the CM/ECF system, which will  
send notice of such filing to the following:

Crystal Howery  
584 Castro Street  
San Francisco, CA 94114  
Email: acluplaintiff@hotmail.com

s/Kristina Detwiler  
Kristina Detwiler, WSBA No. 26448  
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